## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION CIVIL NO. 3:24-CV-01002

SALLAMONDRA ROBINSON, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF SHANQUELLA ROBINSON, DECEASED,	))))
Plaintiff,	)
	)
	)
v.	)
DAEJHANAE JACKSON, ALYSSE HYATT, MALIK DYER, WENTER DONOVAN, KHALIL COOKE, NAZEER TYREE WIGGINS, UNITED STATES DEPARTMENT OF STATE, AND THE FEDERAL BUREAU OF INVESTIGATION,	
Defendants.	)

## DECLARATION OF KRISTINA BEARD

- I, Kristina Beard, make the following declaration in lieu of an affidavit in accordance with 28 U.S.C. § 1746. I understand that my declaration will be filed in the above-referenced case, and that this is the legal equivalent of a statement under oath.
- I am employed as an Attorney-Adviser within the United States Department of
   State. As such, I am familiar with the record-keeping practices relating to the filing and



adjudication of administrative claims presented under 28 U.S.C. § 2672 to the Department of State, which are based on the activities of employees of the Department of State.

2. All administrative tort claims under the Federal Tort Claims Act pertaining to the

Department of State's activities are handled by the Office of the Legal Adviser, in the Office of

International Claims and Investment Disputes (L/CID).

3. I have access to the electronic databases and paper files concerning administrative

claims filed under the Federal Tort Claims Act, which are maintained by the Department of State

in the ordinary course of business.

4. I have searched or asked others in my office to search all available tort claim

records and found that there is no evidence that Plaintiff has filed an administrative claim with

our office under the Federal Tort Claims Act.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing

is true and correct. Executed on this 21st day of January, 2025.

Kristina Beard

Attorney-Adviser

U.S. Department of State Office of the Legal Adviser

Kristina Beard

Office of International Claims

and Investment Disputes